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JUN 12 2012

U.S. COURT OF
FEDERAL CLAIMSIN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST

SIERRA NEVADA CORPORATION,

Plaintiff,

v.

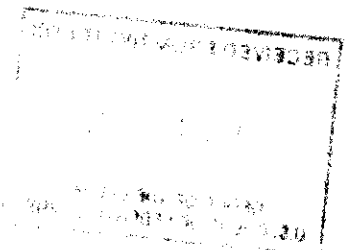
THE UNITED STATES OF AMERICA,

Defendant.

No. **12-375 C**
(Judge _____)**PLAINTIFF'S MOTION FOR PROTECTIVE ORDER
AND FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Appendix C, ¶4 of the Rules of the United States Court of Federal Claims ("RCFC"), Plaintiff Sierra Nevada Corporation ("SNC"), by and through its counsel, hereby requests that this Court enter a Protective Order in the above-captioned case and allow Sierra Nevada to file the Complaint for Declaratory Relief under seal. The reasons in support of this motion are outlined below:

1. This action concerns the arbitrary and capricious decision by the United States of America, acting by and through the United States Department of Defense and the Department of the Air Force (the "Air Force") to terminate a contract awarded to SNC ("the LAS contract") on Solicitation No. FA8637-10-R-6000 ("the Original Solicitation") and to invite new proposals in response to an Amended Solicitation ("the Amended Solicitation"). The above-referenced pleadings contain confidential and proprietary information submitted by SNC to the Air Force in connection with SNC's response to the Original Solicitation.



2. The release of this information to SNC's competitors and/or the public in general has the potential to cause irreparable harm to SNC's business and/or the business of other federal contractors.

3. SNC has included a redacted version of the above-referenced pleadings that can be made available to the public.

4. A copy of a Proposed Protective Order, which is modeled on the Department of Justice's standard proposed protective order, and a proposed Order granting SNC's Motion to File Under Seal is enclosed.

WHEREFORE, SNC respectfully requests that the Court issue a Protective Order in this case that restricts access to pleadings, motions, documents and any other materials constituting the court file for the above-captioned matter and all related and subsequent proceedings to only those individuals admitted under such Protective Order and pursuant to the terms thereof.

Additionally, SNC requests that the Court grant it leave to file the Complaint for Declaratory Relief under seal.

Dated June 12, 2012

Respectfully submitted,

s/ Todd W. Miller

Todd W. Miller

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